## Docket No.: BLD920030025US1

## Remarks

In the non-final Office Action mailed May 1, 2008 claims 1-4, 9-13, 18-21, and 25 are pending and claims 1-4, 9-13, 18-21, and 25 stand rejected. The Applicants have amended the specification to fix a typographical error. The Applicants traverse the rejection herein.

## 35 U.S.C. § 103 Rejection

The Examiner rejected claims 1-4, 9-13, 18-21, and 25 under 35 U.S.C. § 103(a) as being obvious in view of U.S. Patent No. 6,690,478 (McIntyre) in various combinations with U.S. Patent Publication No. 2004/0243934 (Wood), U.S. Patent No. 6,559,958 (Motamed), and U.S. Patent No. 6,504,621 (Salgado). The Applicants submit that the cited art does not teach all of the limitations of the pending claims, and that the Examiner has improperly combined Wood with the remaining cited art in rejecting elements of claim 1.

Claim 1, paraphrased herein, recites a method for transforming a datastream from a first format into a second format in a parallel fashion. According to the method, a single job is parsed into a plurality of work units. Each work unit is queued for processing by a computing node based on the type of the work unit. For example, a work unit may be a scheduled work unit, an immediate work unit, or an interrupt work unit, each of which is queued in a different manner. Scheduled work units are processed after all the remaining work units in the queue have been processed. Immediate work units are sent to the front of the queue for processing after the current work unit is finished. Interrupt work units are processed immediately, regardless of any work unit in progress. Each work unit is then processed in parallel and in any order by the computing nodes to convert the work units from a first format into a second format.

The Examiner has suggested that the cited art teaches all the limitations of claim 1.

Specifically, the Examiner has suggested that Salgado teaches the recited queuing elements in claim

1. The Applicants respectfully disagree. Salgado teaches a queue management system for managing print jobs. In Salgado, a plurality of print jobs are queued in a structured order for printing. In Salgado, the smallest "work unit" for queuing is a print job. Claim 1 in the pending application specifically recites that a "plurality of work units are parsed from a single job". While Salgado may suggest a queue mechanism for print jobs, Salgado does not teach or reasonably suggest that the print jobs can be parsed into a plurality of work units nor does Salgado teach or reasonably suggest that the plurality of work units can be queued for processing in the manner recited in claim 1. The

Applicants further submit that none of the art of record teaches or reasonably suggest the work unit queuing limitation recited in claim 1, and therefore claim 1 is non-obvious in view of the cited art.

In further rejecting claim 1, the Examiner suggested that Wood teaches parsing the datastream into a plurality of work units for processing from a first format to a second format and queuing the work units for processing by a computing node. Wood teaches methods for parallel processing of page description language (PDL) data. In Wood, a PDL data stream is parsed into segments for parallel processing (Summary). The Examiner, however, has indicated that Wood does not teach that each work unit may be processed independent of all other work units. In alleviating this weakness in Wood, the Examiner suggested that the combination of Wood and Motamed teaches that each work unit may be processed independent of other work units. The Applicants submit that the Examiner has improperly combined Wood with Motamed because Wood specifically teaches away from processing work units in an independent manner. Wood specifically states that "before a PDL processor may process a specific segment...the processor must first process...all previous segments"(Column 3, paragraph 34). The Applicants submit that Wood, as combined to alleviate the lack of disclosure to process work units in an independent manner, is not operable in combination with Motamed to perform the recited limitations of claim 1 as cited by the Examiner.

The Applicants submit that for at least the reasons provided above that claim 1 is nonobvious in view of the cited art. Dependent claims 2-4 and 9, which recited additional limitations of base claim 1, are non-obvious for at least depending on allowable base claim 1. Independent claims 10 and 19, which recited analogous features of claim 1 in alternate forms, are non-obvious for at least the reasons provided for claim 1. Dependent claims 11-13, 17, 20-21, and 25 are non-obvious for at least depending on allowable base claims 10 and 19.

## Conclusion

The Applicants submit that claims 1-4, 9-13, 18-21, and 25 are non-obvious in view of the cited art, and therefore respectfully request the Examiner allow claims 1-4, 9-13, 18-21, and 25.

Docket No.: BLD920030025US1

Respectfully submitted,

Date: July 31, 2008 /Sean J. Varley/

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